

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN, AUGUST TERRENCE)
ROLIN, STACY JONES-NASR, and MATTHEW)
BERGER on behalf of themselves and all others)
similarly situated,)
Plaintiffs,)
v.) CASE NO. 2:20-cv-00064-MJH-LPL
TRANSPORTATION SECURITY)
ADMINISTRATION; DAVID P. PEKOSKE,)
Administrator, Transportation Security)
Administration, in his official capacity; DRUG)
ENFORCEMENT ADMINISTRATION;)
D. CHRISTOPHER EVANS, Acting)
Administrator, Drug Enforcement Administration,)
in his official capacity; STEVE DAWKIN,)
Agent, Drug Enforcement Administration, in his)
individual capacity; and UNITED STATES OF)
AMERICA,)
Defendants.)
)

AFFIDAVIT FOR ADMISSION *PRO HAC VICE* OF ELIZABETH TULIS

I, Elizabeth Tulis, make this affidavit in support of the *nunc pro tunc* motion for my admission to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Defendants Transportation Security Administration; David P. Pekoske, Administrator, Transportation Security Administration; Drug Enforcement Administration; D. Christopher Evans, Acting Administrator, Drug Enforcement Administration; and the United States of America (together, the “Government Defendants”). Pursuant to 28 U.S.C. § 517, LCvR 83.2 and 83.3, LCrR

83.2, and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151), I do hereby declare and affirm as follows:

1. Pursuant to 28 U.S.C. § 517, "any officer of the Department of Justice" may, in "any State or district in the United States [] attend to the interests of the United States in a suit pending in a court of the United States[.]"

2. I am an attorney with the U.S. Department of Justice, Civil Division, Federal Programs Branch, assigned to represent the Government Defendants in this case.

3. My business address is 1100 L Street, NW, Washington, DC 20005.

4. I am a licensed attorney and member in good standing of the New York State bar.

A current certificate of good standing is attached to this affidavit as Exhibit A.

5. New York State does not assign "bar identification numbers." However, my New York State bar registration number is 4905956.

6. I am also a member of the bars of the U.S. District Court for the Western District of Texas, the U.S. Court of Appeals for the Fifth Circuit, and the U.S. Court of Appeals for the Second Circuit. In addition, I have government attorney membership status as a member of the bar of the U.S. District Court for the District of Columbia.

7. I have not been subject to any disciplinary actions concerning my practice of law.

8. I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.

9. I filed a notice of appearance in this matter on March 6, 2020. (ECF No. 21).

10. Due to Covid-19 protocols followed by the U.S. Department of Justice and associated mail delays, I did not receive until March 20, 2021, physical mail from the Clerk of Court for the U.S. District Court of the Western District of Pennsylvania dated August 26, 2020,

which advised me that the office's records indicated that I was "not admitted to practice before this Court," and directed me to (1) arrange for general admission to practice in this Court, (2) file a motion for *pro hac vice* admission, or (3) advise the Court that I had obtained local counsel. The letter directed me to take one of these actions "[w]ithin seven (7) days." Accordingly, out of an abundance of caution, I am now seeking *pro hac vice* admission *nunc pro tunc*.

11. I have read, know, and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.

12. Based upon the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter, *nunc pro tunc*. Should the Court request, I can provide any additional information necessary.

I certify and attest that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Dated: March 24, 2021

/s/ Elizabeth Tulis
ELIZABETH TULIS
Trial Attorney
Federal Programs Branch
U.S. Department of Justice, Civil Division

Attorney for the Government Defendants